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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY: *g*

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

10 UNITED STATES OF AMERICA, ) Criminal Case No. **08 CR 0267 L**  
11 )  
11 Plaintiff, ) I N D I C T M E N T  
12 )  
12 v. ) Title 18, U.S.C., Sec. 2113(a) -  
13 ) Bank Robbery; Title 18, U.S.C.,  
13 MICHAEL DANIEL LILLY MARTIN (1), ) Sec. 2 - Aiding and Abetting  
14 MELANIE ELIZABETH DEPALMER (2), )  
14 )  
15 Defendants. )

16 The grand jury charges:

17 Count 1

18 On or about October 2, 2007, within the Southern District of  
19 California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE  
20 ELIZABETH DEPALMER, by force, violence and by intimidation, did  
21 unlawfully take from the person and presence of an employee of Wells  
22 Fargo Bank, 8898 Navajo Road, San Diego, California, the sum of  
23 approximately \$744.00, belonging to and in the care, custody, control,  
24 management, and possession of Wells Fargo Bank, a bank, the deposits  
25 of which were then insured by the Federal Deposit Insurance  
26 Corporation (FDIC); in violation of Title 18, United States Code,  
27 Sections 2113(a) and 2.

28 //

LAC:em:San Diego  
1/30/08

Count 2

On or about October 3, 2007, within the Southern District of California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE ELIZABETH DEPALMER, by force, violence and by intimidation, did unlawfully take from the person and presence of an employee of Washington Mutual Bank, 348 South Twin Oaks Valley Road, San Marcos, California, the sum of approximately \$1,000.00, belonging to and in the care, custody, control, management, and possession of Washington Mutual Bank, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC); in violation of Title 18, United States Code, Sections 2113(a) and 2.

Count 3

On or about October 4, 2007, within the Southern District of California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE ELIZABETH DEPALMER, by force, violence and by intimidation, did unlawfully take from the person and presence of an employee of Union Bank of California, 1512 Main Street, Ramona, California, the sum of approximately \$4,000.00, belonging to and in the care, custody, control, management, and possession of Union Bank of California, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC); in violation of Title 18, United States Code, Sections 2113(a) and 2.

Count 4

On or about October 5, 2007, within the Southern District of California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE ELIZABETH DEPALMER, by force, violence and by intimidation, did unlawfully take from the person and presence of an employee of Citibank, 3777 Avocado Blvd., La Mesa, California, the sum of

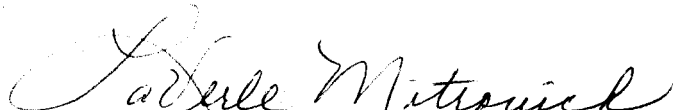
1 approximately \$4,273.00, belonging to and in the care, custody,  
2 control, management, and possession of Citibank, a bank, the deposits  
3 of which were then insured by the Federal Deposit Insurance  
4 Corporation (FDIC); in violation of Title 18, United States Code,  
5 Sections 2113(a) and 2.

6 Count 5


7 On or about October 29, 2007, within the Southern District of  
8 California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE  
9 ELIZABETH DEPALMER, by force, violence and by intimidation, did  
10 unlawfully take from the person and presence of an employee of  
11 California Bank & Trust Bank, 135 Saxony Road, Encinitas, California,  
12 the sum of approximately \$2,150.00, belonging to and in the care,  
13 custody, control, management, and possession of California Bank &  
14 Trust Bank, a bank, the deposits of which were then insured by the  
15 Federal Deposit Insurance Corporation (FDIC); in violation of  
16 Title 18, United States Code, Sections 2113(a) and 2.

17 DATED: January 31, 2008.

18 A TRUE BILL:

19  
20   
21 Foreperson Deputy

22 KAREN P. HEWITT  
23 United States Attorney

24 By:   
25 LAWRENCE A. CASPER  
26 Assistant U.S. Attorney  
27  
28